

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Policies to Respond to the Ongoing	)	GN Docket No. 12-353
Technological Transition of Voice Networks	)	
	)	
IP-Enabled Services	)	CC Docket No. 02-23
	)	

**COMMENTS OF MEMBERS OF THE RURAL BROADBAND POLICY GROUP:  
ACCESS HUMBOLDT, AKAKU: MAUI COMMUNITY TELEVISION,  
APPALSHOP, CALIFORNIA CENTER FOR RURAL POLICY, CENTER FOR  
MEDIA JUSTICE, CENTER FOR RURAL STRATEGIES, CENTRAL  
APPALACHIA REGIONAL NETWORK, HIGHLANDER RESEARCH AND  
EDUCATION CENTER, INSTITUTE FOR LOCAL SELF RELIANCE, MAIN  
STREET PROJECT, MEDIA LITERACY PROJECT, MOUNTAIN AREA  
INFORMATION NETWORK, NATIONAL RURAL EDUCATION  
ASSOCIATION, PARTNERSHIP OF AFRICAN AMERICAN CHURCHES, AND  
VIRGINIA RURAL HEALTH ASSOCIATION.**

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January 28, 2013

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**COMMENTS TO DENY AT&T'S PETITION TO LAUNCH A PROCEEDING  
CONCERNING THE TDM-TO-IP TRANSITION  
OF MEMBERS OF THE RURAL BROADBAND POLICY GROUP**

To: The Federal Communications Commission

Members of the Rural Broadband Policy Group (RBPG) submit these comments respectfully urging the Federal Communications Commission to deny the AT&T's Petition to Launch a Proceeding Concerning the TDM-to-IP Transition. RBPG is alarmed at the request AT&T has presented before the Commission, and believes that approving this petition will inflict negative consequences on rural communities and consumers including loss of affordable and reliable basic telephone service, which is the only form of communication many remote communities can access; eliminate consumer protections that have made it possible for rural people to access telecommunications services; reverse our commitment to Universal Service; endanger our national public safety; and fuel a divest-from-Rural-trend that will disadvantage our national economy and global competency. We simply cannot allow that to happen.

Respectfully submitted,

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## I. INTRODUCTION

According to the Federal Communications Commission 8th Broadband Progress Report released last August, fixed broadband networks do not reach 19 million Americans. Of those unserved by fixed broadband networks, 14.5 million live in rural and nearly a third in Tribal lands.<sup>1</sup> These statistics demonstrate a digital divide that continues to keep rural communities from opportunities in education, health care, economic development, and civic participation. As a result of this persistent divide, rural America – and our nation – is in danger of falling further behind.

In order to close the digital divide, federal and state policies and the entities responsible for drafting and implementing those policies, like the Federal Communications Commission, must support efforts that lower prices, create local jobs, prioritize digital literacy, encourage innovation, increase competition, invest in rural communities, and are accountable to rural consumers.

We need broadband policies that reflect the importance of high-speed Internet access as a basic necessity and prioritize the ability of every community to participate in the digital economy. AT&T's petition hurts rural consumers, providers, communities, and by extension, endangers the future of our nation as we seek to remain leaders in the global economy.

AT&T's petition is part of a larger effort to change federal and state policies that seek to increase profits at the expense of rural communities. Effectively, AT&T's policies divest from rural America by:

- Establishing “Trial runs” in “select wire centers” where consumers will have no ability to opt-out from the trial and risk losing reliable, affordable, and protected telephone service;
- Eliminating regulations that protect consumers from abuse by telecommunications providers;
- Removing the authority of Public Utilities Commissions to protect and defend consumers; and

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<sup>1</sup> *Eight Broadband Progress Report*, Federal Communications Commission. August 24, 2012

- Hoarding publicly-funded networks from other providers who do want to serve rural communities.

These actions are directly against our nation's commitment to Universal Service and the responsibility of the Federal Communications Commission to ensure that all people have access to telecommunications services. We do not expect AT&T to place the needs of rural consumers and providers above its need to maximize profits. We know that AT&T regards rural communities as unprofitable, and thus, undesirable areas of service.

However, while it is not the job of AT&T to look out for the wellbeing of rural, it is the responsibility of the Federal Communications Commission as a servant of the public. Without the Commission's support, rural will be cut off. Granting AT&T's petition, endorses the trend of divestment from rural America.

As the Commission knows, rural, low-income, and Native communities constitute the majority of those left unserved today. Unavailability of service and high prices are two of the top barriers that these communities cite to access wireless, broadband, and basic telephone services. Even basic telephone service is not ubiquitous in our country. In Indian Country, over 31 percent do not have basic phone service.<sup>2</sup> And across the states, close to 11 million people depend on the Lifeline program to be able to afford a telephone line.<sup>3</sup>

RBPG is alarmed at the request AT&T has presented before the Commission, and believes that approving this petition will inflict negative consequences for rural communities and consumers including the loss of affordable and reliable basic telephone service, which is the only form of communication many remote and poor communities can access. The petition also seeks to eliminate consumer protections that have made it possible for rural people to access telecommunications services such as Section 214 Requirements; reverse our commitment to Universal Service; endanger our national public safety; and fuel a divest-from-rural-trend that will disadvantage our national economy and global competency. If approved, this petition will send a clear message to rural people signaling that the interests of telecommunications corporations that have

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<sup>2</sup> *Universal Service Monitoring Report*, CC Docket No. 98-202. Federal Communications Commission. 2010

<sup>3</sup> *Universal Service Monitoring Report*, CC Docket No. 98-202. Federal Communications Commission. 2010

long ignored them are more important than upholding the right of all people to accessible, affordable and reliable communications services. We simply cannot allow that to happen.

The following comments discuss why the AT&T petition is detrimental to rural people, and explains the reasons for which it should be denied. Most importantly, these comments present recommendations for the Federal Communications Commission about what it *can* do to support broadband deployment, infrastructure, and advancement of Universal Service for all.

## II. NEGATIVE CONSEQUENCES OF AT&T’S PETITION

### A. Loss of the Most Accessible and Reliable Communications Tool in Rural America: TDM-Based Telephone Service

As rural and broadband advocates, we know the importance of having access to all forms of communication, including basic telephone service. Access to communication is a fundamental human right that must be upheld across all communication tools. As communities that have historically experienced lack of access to communications, we know that lack of basic telephone service isolates people.

The petition AT&T submitted asks the Commission to conduct “trial runs of the transition to next-generation services, including the retirement of time-division multiplexed facilities and offerings and their replacement with IP-based alternatives.”<sup>4</sup> By requesting to retire TDM-based services, AT&T is essentially asking the FCC to shut down the most accessible and reliable communications tool in rural America. Internet Protocol-based voice services necessitate high-speed Internet connectivity, which is not currently available to at least 14.5 million rural people. Thus, if voice services become *only* IP-based, then millions of rural people risk an **absolute** loss of communication.

AT&T’s proposed “trial runs” put at risk the ability to communicate of all people living in the “select wire centers” they identify, even if “Incumbent Local Exchange Carriers elect to participate.” As public servants responsible for safeguarding the right to communicate of all Americans, the Commission cannot permit these trial runs, especially

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<sup>4</sup> AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, pg. 1, filed November 7, 2012.

since there is no way that any current or future customer in these select wire centers can opt-out of the loss of TDM-based telephone service. These trial runs are a forced migration to a technology that is more expensive, unreliable, and often unavailable. Some may have the option of switching to a wireless service; however, such services are more expensive and are unavailable in many rural areas. Even those areas that carriers claim to serve are often unable to use wireless devices indoors. Furthermore, the Commission cannot create an environment where customers are stripped from their legal right to obtain the specific service they already paid for simply because a telecommunications provider decided to discontinue that service.

AT&T's petition also makes a dangerous assumption in considering IP-based voice services adequate "alternatives" to TDM-based telephone service. To be clear, IP-based voice services are **not** comparable to basic telephone service. Because millions of people lack access to high-speed Internet, IP-based voice services are currently unavailable to them and cannot even consider said service as an option, much less an "alternative." This very lack of fixed broadband access in rural makes any IP-based voice service unreliable, especially if the only access to the IP-based voice service is over a wireless network. It is common knowledge that wireless networks, like the ones that AT&T would use as "alternatives" to fixed networks, are currently fickle and unreliable, particularly in rural areas. Thus, a service that depends on a network that is not available or unreliable is only an empty promise and by no means an alternative. By comparison, TDM-based telephone service is nearly ubiquitous and reliable. Rather than assuming TDM may be phased out because of other options, the Commission must ensure that possible alternatives first be in place to all, affordable and fully reliable, before considering any change in policy.

In addition, IP-based voice services, monthly plans, and their devices, are more expensive than basic landline telephone service. In rural areas, lack of competition in the wireless and fixed-broadband markets make IP-based voice services more expensive and more difficult for low-income rural families to afford. Further, IP-based voice services are often unavailable as stand-alone services and offered *only* in bundled packages, which forces a family to pay more for additional services they may not need, want, or afford. Finally, TDM-based landline services are generally unlimited. AT&T's petition states

that the company will “offer wireless communications alternatives to customers living in particularly high-cost areas.”<sup>5</sup> The Commission cannot ignore the fact that a monthly cellular phone plan has a limited amount of minutes for use and that if a family needs more time they will have to pay more, while TDM-based local telephone service is unlimited and thus more affordable for a family.

Without TDM-based telephone services, rural people will be cut off from the communication that is most affordable, available and reliable to them. They will be cut off from economic and civic participation and disconnected from the safety guaranteed by our nation’s emergency service network. We applaud the expansion of IP-based voice services *in addition* to the invaluable TDM-based telephone services most of rural people already enjoy. We firmly believe that IP-based voice service expansion does not have to take place at the expense of basic telephone service.

## **B. Reverses Our Commitment to Universal Service**

Since 1936, our nation has proudly upheld Universal Service, the principle to advance telecommunications services to the least served including those in low-income, rural, insular, and high cost areas. It is our commitment to Universal Service that created the Universal Service Fund and has led to 97 percent telephone access across the country. However, the work is not done. 67 percent of Tribal communities still do not have access to a landline, and close to 11 million people depend on the USF Lifeline program to be able to afford this basic communication tool. These figures indicate that the regulations designed to advance Universal Service are still needed now for basic telephone service, and given their success, should be our regulatory base for universal broadband service.

In spite of the success of Universal Service regulations and of the millions in federal and state subsidies that AT&T has leveraged from them, AT&T’s petition requests the Commission to completely eliminate them. Specifically, AT&T asks the Commission to no longer require Incumbent Local Exchange Carriers to obtain Section 214(a) Approval to stop providing legacy wireline services; prohibit carriers that do provide legacy wireline services and their customers from demanding said service or

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<sup>5</sup> AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, pg. 9, filed November 7, 2012.

interconnection in TDM format; prohibit current and new customers from demanding legacy wireline services and forcibly switch them to an “alternative service;” and preemptively prohibit similar regulation of Internet Protocol services that would advance broadband Universal Service.<sup>6</sup> AT&T’s requests are directly in opposition to our national commitment and the Commission’s responsibility to advance Universal Service of telecommunications. Simply put, with this petition, AT&T seeks a no-regulation pass to conduct business as it pleases and prioritize its profits, not the public interest.

Now more than ever, as our communications technologies evolve and high-speed Internet access is designated as a basic human right<sup>7</sup>, we need to look up to the regulations that have helped us advance Universal Service. Eliminating regulations that increase access to advanced telecommunications nationally and address the needs of the least served is the wrong moral and economic decision. We cannot allow the United States to become the first industrialized nation to backtrack in our commitment to 100 percent access to basic communication. And we cannot sacrifice valuable policies that have helped us become a global leader. AT&T’s requests effectively reverse our commitment to Universal Service, and for this very reason, we respectfully ask the Federal Communications Commission to deny their petition.

### **C. Eliminates Consumer Protections**

97 percent of our country has access to basic landline telephone service. We boast 87 million residential telephone subscriptions,<sup>8</sup> and the commitment to help 10.6 million subscribers to be able to afford their telephone service. These impressive accomplishments are possible thanks to federal regulations and state regulatory entities that protect consumers.

For example, Basic Local Exchange Service (BLES), or basic telephone service, is the simplest form of telephone service and allows customers to make and receive unlimited local calls at a flat, monthly rate. This monthly rate is capped, in an effort to

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<sup>6</sup> AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, pg. 21-22, filed November 7, 2012.

<sup>7</sup> Human Rights Council, Twentieth Session Agenda Item 3. United Nations, General Assembly. June 29, 2012.

<sup>8</sup> *Eight Broadband Progress Report*, Federal Communications Commission. August 24, 2012



provide all consumers access to affordable telephone service.<sup>9</sup> Carrier of Last Resort (COLR) is the requirement that a telephone company make basic telephone service available on a reasonable and nondiscriminatory basis to any customer in its service territory who requests the service.<sup>10</sup>

BLES providers and Carriers of Last Resort must follow standards that protect consumers. For example, timely repairs of service outages, customer credits when outages are not resolved on time, notification before discontinuing service, reasonable bill payment, prohibition of cramming (the illegal practice of placing unauthorized, misleading or deceptive charges on local telephone bills) and slamming (switching a phone service to a different provider without notifying the customer), and requirement to maintain two weeks worth of electricity back-up to ensure that telephone lines continue functioning during and after a natural disaster, among others. As we have learned from recent natural disasters, consumers need more protections to ensure communications networks continue to function after such events.

AT&T's petition calls for abolishing rules that protect consumers and seeks to strip regulatory bodies, such as Public Utilities Commissions, from being able to enforce them. AT&T goes too far in claiming that the Federal Communications Commission even has the ability to intervene in the decision of a state to protect consumers by maintaining these regulations and extending them to Internet Protocol services.

Approving AT&T's petition will be the first step in a dangerous federal deregulation plan to eliminate consumer protections. AT&T envisions a national deregulated telecommunications environment where companies are allowed to exempt themselves from the minimum service quality standards that currently apply to basic telephone service, and make sure that said standards are not considered for IP-based services.

However, these standards allow rural people to communicate with their loved ones, elected officials, potential employers, medical providers and the society at large. Without

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<sup>9</sup> "SB 271 Consumers may face Higher Telephone Prices and Reduced Service Quality," Consumer's Fact Sheet, Office of the Ohio Consumers' Counsel. Can be found at: <http://www.pickocc.org/l/services/sb271-telecom.shtml>

<sup>10</sup> "SB 271 Consumers may face Higher Telephone Prices and Reduced Service Quality," Consumer's Fact Sheet, Office of the Ohio Consumers' Counsel. Can be found at: <http://www.pickocc.org/l/services/sb271-telecom.shtml>

these crucial protections, we are putting at risk affordable, quality, and reliable communications for rural Americans.

As a national coalition, we have seen AT&T and other companies introduce bills that seek to eliminate these protections at the state level. Each bill had a unique approach, but the same goal: to deregulate telephone and broadband services. Each bill also asked for abolishing the ability of Public Utilities Commissions and any other state body to enforce regulations and protect consumers.

Maintaining consumer protections for telephone and broadband services is **not** in conflict with supporting the development of our nation's high-tech leadership, future and economy. In fact, consumer protections are elemental in maintaining a truly robust, profitable, and innovative telecommunications future for all Americans. For these reasons, we respectfully urge the Commission to deny AT&T's petition and refuse to buy into their rhetoric of eliminating consumer protections.

#### **D. Endangers Our Public Safety**

In its petition, AT&T calls for abolishment of regulations that guarantee basic, affordable, wireline service, and encourages the Commission to prohibit implementing such requirements on IP-based providers. Eliminating these protections would not only mean a loss of communication to rural people, but also the loss of reliable, life-saving 911 services.

AT&T's careless approach to deregulation eliminates fundamental services needed by all people to remain safe during community-wide emergencies. Consider the vulnerability of people who will be at risk of not having the tools to communicate, like rural, poor, elderly, and Native constituents, especially during a time of need. Take for example the power outage that left about 2.3 million Northern Virginia residents without emergency 911 services for up to four days after a thunderstorm, in part because a Verizon backup generator would not start.<sup>11</sup> And, as Hurricane Sandy demonstrated, our current wireless networks, even in New York City (one of the leading metropolises of the world), are not ready to support the emergency-service needs of our nation. News story

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<sup>11</sup> "911 failure affected 2.3 million in Northern Virginia," July 11, 2012. Available at [http://www.washingtonpost.com/local/911-failure-cut-23-million-off-in-northern-virginia/2012/07/11/gJQAWGuedW\\_story.html](http://www.washingtonpost.com/local/911-failure-cut-23-million-off-in-northern-virginia/2012/07/11/gJQAWGuedW_story.html)

after news story reported New Yorkers' rediscovery of the pay phone, and whatever public outlet they could access to charge their cellular device. The wireless networks available in New York could not compare to the reliability and accessibility of TDM-based services. And, the short battery life of a mobile device makes it almost instantly unavailable during a power outage, especially if the IP-based network it depends on has no requirements of back-up power either. By contrast, legacy TDM-based networks and wirelines are required to have two weeks of back up electric power so that they can work during and after a natural disaster.

Rural and low-income people are already at a disadvantage in accessing resources after a natural disaster. In areas that are spread out and have less disaster relief agencies, having a phone line guaranteed for two weeks after a disaster strikes can make all the difference between life and death. Simply put, the deregulation requests of the AT&T petition endanger our national public safety.

Affordable, reliable, and regulated basic telephone service guarantees connection to emergency and disaster relief communications. As our ability to communicate over IP-based services increases, we encourage the Commission to include the regulations that guarantee access to 911 and prioritize our national public safety.

#### **E. Fuels a Divest-from-Rural Trend**

One of the most pernicious components of the AT&T petition before the Commission is the ultimatum-style demand for deregulation as a requisite for private investment in wireline and wireless networks. According to AT&T, "the regulatory environment influences providers' investment decisions" and "many of these investments will likely be predicated on the expectation that the Commission will follow through on its own promise to facilitate the transition away from TDM-based services."<sup>12</sup> Effectively, AT&T's petition is an ultimatum to the FCC: If the Commission does not deregulate, they will not invest. But AT&T's investment decisions are guided first and foremost by its need to succeed in the market. Just as AT&T's claims rang false in justifying the T-Mobile merger, any threats to diminish investment are hollow. AT&T

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<sup>12</sup> AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, pg. 8, filed November 7, 2012.

will invest based on its need to compete in a marketplace it regularly claims offers many choices to consumers. If that is true, then any threat by AT&T to stop investing would be fatal to the company.

While the FCC might feel pressured to satisfy the demands of AT&T, it must be aware that complying with AT&T will come at great cost to rural. AT&T demands an environment without regulations that fuels a dangerous Divest-From-Rural Trend for other companies to follow.

Last year, Verizon CEO Lowell McAdam told attendees of an investor conference that the company planned to kill the copper in every place where they have FiOS. "We are going to just take it out of service. Areas that are more rural and more sparsely populated, we have got LTE built that will handle all of those services and so we are going to cut the copper off there," said McAdam.<sup>13</sup> AT&T also announced its plans to eliminate rural copper and replace it with a 4G LTE network that they claim will cover 99% of AT&T's existing copper footprint. Both companies have led a deregulation agenda at the state level. AT&T's petition before the Commission is part of their strategy to pushing deregulation at the federal level.

While AT&T claims to be interested in investing, its demands to deregulate divest resources, services, and funds that are crucial to the future of rural communities. Because of its reliability, affordability, and accessibility, TDM-based telephone service is invaluable to rural, particularly because it is the only service available for so many. Further, Universal Service requirements are vital to ensure the participation of rural communities in our economy and democracy, and thus to the success of our nation as a global leader. For these reasons, we respectfully urge the Commission to deny AT&T's petition since its approval would unleash a deregulation trend that cuts off rural communities and encourages other providers to also abandon rural America.

### **III. SUPPORTING RURAL BROADBAND CUSTOMERS & PROVIDERS**

Fast, affordable, and reliable Internet access is no longer a luxury, but a necessity, especially for rural America. As more everyday activities become available only online -

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<sup>13</sup> "Op-ed: Verizon willfully driving DSL users into the arms of cable," Ars Technica, July 25, 2012. Available at <http://arstechnica.com/tech-policy/2012/07/op-ed-verizon-willfully-driving-dsl-users-into-the-arms-of-cable/>

from booking a flight to medical appointments, and job applications to social services - it is evident that broadband is an essential utility for economic opportunity and prosperity. In order to close the digital divide, policies must support efforts that lower prices, create local jobs, prioritize digital literacy, encourage innovation, increase competition, invest in rural communities, and are accountable to rural consumers. That is why, as rural broadband advocates, we must go beyond simply encouraging the Commission to deny bad proposals. We must also provide solutions that the Commission can say yes to. This section includes recommendations that we respectfully encourage the Federal Communications Commission to adopt as solutions to close the digital divide.

#### **A. Make Connect America Funds Available to Non-Eligible Telecommunications Carriers**

As established in our Rural Broadband Principles, we believe that policies that prioritize Local Ownership and Investment in Community can help close the digital divide that persists in our country. For example, allowing Non-Eligible Telecommunications Carriers (Non-ETCs) such as non-profits, municipalities, American Indian Tribes, community institutions, and co-ops to apply and receive Connect America Funds.

Because of their interest to provide service in unserved communities, Non-ETCs can address issues with access, affordability, deployment, lack of competition, limited provider choice, open access, digital literacy, and data collection – problems ignored by absentee telecommunications providers. Additionally, allowing non-ETCs to receive CAF funds creates the opportunity for rural communities own their communications infrastructure, boost their economy, create jobs, and become more accountable to make broadband accessible to every resident. As advocates from rural communities, we believe that allowing Non-ETCs to receive CAF funds is crucial for the following reasons:

- Non-ETCs are valuable to connect rural communities that are otherwise deemed unprofitable and ignored by large absentee telecommunications corporations.
- Non-ETCs can boost local economies, creates job, and retain wealth in our communities.
- It is easier to hold a local Non-ETC provider accountable to the responsibility to

provide service to every resident in a rural community.

- Ownership of our local infrastructure creates opportunities for our youth to become the future of our towns, gives them the opportunity to compete and participate globally, and spurs innovation.
- A Non-ETC local provider is more knowledgeable about the community and better equipped to respond to the unique characteristics and needs of each rural community.

Even high-tech-focused states like California, are favorably considering extending their state broadband funds to Non-ETCs. This is in direct response to the painful reality that large telecommunications corporations like AT&T and Verizon refuse to accept state-regulated funds for broadband deployment. A reality that the very Commission has seen in attempting to distribute CAF Phase I funds.

## **B. Support Municipal Broadband**

As rural residents, we support policies that provide us with tools to solve the challenges we face. Unfortunately, various states have seen bills that ban local communities from building or supporting municipal broadband networks.

We firmly believe that all solutions to closing the digital divide are essential for connecting the vast diversity of rural areas with fast, affordable, and reliable Internet service. Municipal broadband is a valuable solution to connect rural communities, and we cannot afford to lose this option. We need policies that respect the unique characteristics of each rural community, and not tie a community to a specific technology or service from a specific Internet Service Provider. Because of your influence as federal telecommunications advocates for the public interest, we encourage the Commission to speak in support of rural communities building their own telecommunications solutions via municipal broadband.

## **IV. CONCLUSION**

The Rural Broadband Policy Group is alarmed at the request AT&T has presented before the Commission, and believes that approving this petition will inflict negative consequences for rural communities and consumers including loss of affordable and

reliable basic telephone service, which is the only form of communication many remote communities can access; eliminate consumer protections that have made it possible for rural people to access telecommunications services; reverse our commitment to Universal Service; endanger our national public safety; and fuel a divest-from-rural-trend that will disadvantage our national economy and global competency. If approved, this petition will send a clear message to rural consumers and communities signaling that the interests of telecommunications corporations that have long ignored them are more important than upholding the right of all people to accessible, affordable and reliable communications services. We simply cannot allow that to happen.

For all of the reasons expressed above, the Rural Broadband Policy Group respectfully urges the Federal Communications Commission to deny AT&T's petition to launch a proceeding concerning the TDM-to-IP transition, allow "trial runs" that put at risk the ability to communicate of all people living in the "select wire centers," and approve careless deregulation demands that only endanger our national economy and telecommunications leadership.

Further, we respectfully encourage the Commission to consider our recommendations to 1) make CAF funds available to Non-ETCs, and 2) speak in support of Municipal Broadband. The Rural Broadband Policy Group sincerely thanks the Federal Communications Commission for reading our comments and hearing our concerns. We look forward to collaborating with the Commission in the efforts to ensure the vitality of our nation in the global economy. The Rural Broadband Policy Group is a growing national coalition of rural broadband advocates. The RBPG has two goals: 1) to articulate broadband policies that create opportunities for rural communities to participate fully in the nation's democracy, economy, culture, and society, and 2) to spark and kindle collaboration among rural advocates for fast, affordable, and reliable Internet.

Respectfully submitted,

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